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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

JONATHAN MOTA,

Defendant.

No. CR 13-cr 93 JST

JOINT STIPULATION REGARDING  
PROVISION OF DISCOVERY AND  
~~PROPOSED~~ PROTECTIVE ORDER

The United States, through its counsel of record ("the Government"), and defendant Jonathan Mota, by and through his counsel of record, hereby agree and stipulate that the Government has and will continue to provide discovery on the following conditions set forth below. The reason for this stipulation is that some of the discovery in this case contains sensitive information, to include for example third party telephone information and bank account information of witnesses or associated parties. Documents containing any telephone number, social security number/taxpayer identification number, or financial account numbers, or date of birth or home address, or names of minor children of any person that are produced in this matter are deemed Protected Material. Possession of copies of the Protected Material is limited to the defendant, his attorney of record, and investigators, paralegals, law clerks, translators,

**FILED**

AUG 07 2013

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1 interpreters, experts and assistants for the attorneys of record (hereinafter collectively referred to  
2 as "members of the defense team").

3 The defendant, his attorney of record, and members of the defense team acknowledge that  
4 providing copies of the Protected Material to other persons is prohibited, and agree not to  
5 duplicate or provide copies of the Protected Material to other persons. The defendant, his  
6 attorney of record, and members of the defense team may show Protected Material to witnesses  
7 or prospective witnesses in conjunction with their defense of the defendant in this case. The  
8 defendant, his attorneys of record, and members of the defense team further acknowledge that  
9 they are prohibited from using the Protected Material for any purpose other than defending the  
10 defendants in the above-captioned matter. Any violation of these prohibitions constitutes a  
11 violation of the Protective Order. Further, the attorneys of record agree that prior to  
12 disseminating any copies of the Protected Material to members of the defense team, they will  
13 provide a copy of this Protective Order to members of the defense team.

14 The parties acknowledge their redaction responsibilities before the public filing of any  
15 documents and, in compliance with Fed. R. Crim. P. 49.1, each signatory agrees to redact social  
16 Security or taxpayer-identification numbers, financial account numbers, dates of birth, names of  
17 minor children and home addresses.

18 SO STIPULATED.

19 DATED: August 6, 2013

20 /s/  
KATHRYN R. HAUN  
Assistant United States Attorney


21 /s/  
RICHARD MAZER  
Attorney for Jonathan Mota

### 22 PROPOSED ORDER

23 The Court finds appropriate the parties' stipulation with respect to the provision of discovery in  
24 this case. Accordingly, it is hereby ORDERED that discovery will be produced and handled in  
25 accordance with the terms outlined in the "Joint Stipulation Regarding Provision of Discovery."  
26

27 IT IS SO ORDERED.

28 DATED: 8/7/13

  
HON. JON S. TIGAR  
United States District Judge